

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Twana Ahmed,	§	
	§	
<i>Plaintiff,</i>	§	Civil Action No. 4:23-cv-02823
	§	
v.	§	The Honorable Lee H. Rosenthal
	§	
Universal Protection Service, LP, d/b/a	§	Jury Demand
Allied Universal Security Services	§	
	§	
<i>Defendant.</i>	§	

**JOINT MOTION TO MODIFY  
SCHEDULING AND DOCKET CONTROL ORDER**

Plaintiff Twana Ahmed (“Ahmed”) and Defendant Universal Protection Service, LP d/b/a Allied Universal Security Services (“Allied”), through their respective counsel, jointly move to modify the Second Amended Scheduling and Docket Control Order [ECF No. 19] and in support of this motion, state as follows:

1. On July 23, 2024, the Court signed a Second Amended Scheduling and Docket Control Order. ECF No. 19, pp. 1, 2.
2. On November 18, 2024, Allied filed a summary judgment motion. ECF No. 27.
3. The current deadline to file a response and supporting material opposing the summary judgment motion is December 18, 2024. ECF No. 19, p. 2; *see also* LR 7.7 (supporting materials). The current likely deadline to file a reply in support of the summary judgment motion is December 25, 2024. *See* LR 7.4

4. The parties respectfully request that the Court modify the Second Amended Scheduling and Docket Control Order [ECF No. 19] as follows, for good cause addressed below:

**January 10, 2025** — deadline to file a response [including any supporting materials] to Defendant's summary judgment motion [ECF No. 27]

**January 31, 2025** — deadline to file a reply in support of Defendant's summary judgment motion [ECF No. 27]

**April 4, 2025** — deadline to file Joint Pretrial Order and motions in limine

**April 11, 2025** — docket call

5. The parties seek modification of the response and reply deadlines (1) to allow all counsel and the parties to observe with their families Christmas and New Year's Day, (2) to allow lead counsel for Ahmed to honor a planned family vacation after Christmas, and (3) to provide fairness and equity in the amount of additional time provided to each party.

6. The parties seek modification of pretrial deadlines and docket call (1) to allow additional time for the Court to consider the parties' positions on summary judgment, (2) to reduce the likelihood of conflict with a January 21, 2025 jury trial docket call in the earlier-filed *Dedmon v. Shell Exploration & Production Company et. al.*, pending before United States District Judge Charles Eskridge, with jury trial to be set as close to docket call as practicable and with all counsel for Ahmed to participate in that jury trial, and (3) to reduce the likelihood of conflict with a jury trial that starts February 3, 2025 in an earlier-filed case in Midland, Texas, with all counsel for Ahmed to participate in that jury trial.

Respectfully submitted,

<p><i>/s/ Amanda Hernandez</i></p> <hr/> <p>Ms. Amanda C. Hernandez          Attorney-in-Charge          Texas State Bar No. 24064411          Southern District Bar No. 1531045  <a href="mailto:amanda@ahfirm.com">amanda@ahfirm.com</a></p> <p>AH Law, PLLC          5718 Westheimer, Suite 1000          Houston, Texas 77057          T: (713) 588-4359          F: (281) 572-5370</p> <p><i>and</i></p> <p>Ms. Amy E. Gibson          Of Counsel          Texas State Bar No. 00793801          Southern District Bar No. 20147  <a href="mailto:amy@gwfir.com">amy@gwfir.com</a></p> <p>Mr. David L. Wiley          Of Counsel          Texas State Bar No. 24029901          Southern District Bar No. 34134  <a href="mailto:david@gwfir.com">david@gwfir.com</a></p> <p>Gibson Wiley PLLC          1500 Jackson Street #109          Dallas, Texas 75201-4923          T: (214) 522-2121          F: (214) 522-2126</p> <p><i>Attorneys for Plaintiff Twana Ahmed</i></p>	<p><i>/s/ Kelly Eisenlohr-Moul with permission</i></p> <hr/> <p>Ms. Kelly Eisenlohr-Moul          Attorney-in-Charge          Texas State Bar No. 24112896          Southern District Bar No. 3146632  <a href="mailto:keisenlohr-moul@martensonlaw.com">keisenlohr-moul@martensonlaw.com</a></p> <p>Mr. Nathan A. Shine  <i>admitted pro hac vice</i>  <a href="mailto:nshine@martensonlaw.com">nshine@martensonlaw.com</a></p> <p>Martenson, Hasbrouck &amp; Simon LLP          500 Davis Street, Suite 1003          Evanston, Illinois 60201          (224) 350-3123</p> <p><i>Attorneys for Defendant</i></p>
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